

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

UNITED STATES OF AMERICA,	)	
	)	JUDGE DONALD C. NUGENT
Plaintiff,	)	
	)	
v.	)	CASE NO. 1:24-CR-00289
	)	
MATTHEW M. MOTIL,	)	
	)	
Defendant.	)	<b><u>UNOPPOSED MOTION FOR</u></b>
	)	<b><u>PERMISSION TO TRAVEL</u></b>

Now comes the Defendant, Matthew Motil (“Mr. Motil”), by and through counsel, and respectfully moves this Court for an Order granting Defendant permission to intermittently travel back and forth to Santa Maria, California, to assist his parents as they prepare a course of treatment related to his father’s recent cancer diagnosis.<sup>1</sup>

Several weeks ago, Mr. Motil’s father was diagnosed with cancer. This comes on the heels of his mother’s broken arm, which had presented difficulties to Mr. Motil’s father in taking her to various medical appointments given that he works full-time. (*See* ECF No. 20). Now, his father’s recent cancer diagnosis not only exacerbates these logistical problems, but it has taken an emotional toll on his parents as well. Given his parents age and lack of familial support nearby, Mr. Motil respectfully requests this Court’s permission to intermittently travel to and from Santa Maria, California, where he not only can assist his parents with travel and other caretaking activities related to his father’s diagnosis, but can also provide them with emotional support at this difficult time. Given the nature of complications that sometimes accompany cancer diagnoses, Mr.

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<sup>1</sup> Upon the granting of this order, Mr. Motil will provide his supervising officer specific dates and other details in advance of any travel to Santa Maria, California.

Motil requests flexibility in terms of dates of travel so long as he keeps his supervising officer apprised of all details before any travel.

Defense counsel has conferred with the Government regarding this request. The Government has confirmed it is not opposed to Mr. Motil's request. Thus, Mr. Motil respectfully requests this motion be granted.

Respectfully submitted,

/s/ Paul M. Flannery

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**CERTIFICATE OF SERVICE**

I hereby certify that on April 29, 2025, a copy of the foregoing was filed electronically.  
Notice of this filing will be sent to all parties by operation of the Court's electronic filing system.

/s/ Paul M. Flannery

Paul M. Flannery (OH: 0091480)

*Attorney for Defendant Matthew Motil*